

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ANN LEWANDOWSKI, on her own behalf
and on behalf of all others similarly situated,

Plaintiff,

v.

JOHNSON & JOHNSON, THE PENSION
& BENEFITS COMMITTEE OF
JOHNSON & JOHNSON, PETER
FASOLO, WARREN LUTHER, LISA
BLAIR DAVIS, and DOES 1-20,

Defendants.

Case No. 3:24-cv-00671

**STIPULATION AND [PROPOSED]
ORDER**

Plaintiff Ann Lewandowski (“Plaintiff”) and Defendants Johnson & Johnson (“J&J”), the Pension & Benefits Committee of Johnson & Johnson (the “Committee”), Peter Fasolo, Warren Luther, and Lisa Blair (“Defendants,” and together with the Plaintiff, the “Parties”), by and through their respective undersigned counsel, have agreed to the following stipulation, subject to the approval of the Court:

WHEREAS, on February 5, 2024, Plaintiff filed a Class Action Complaint (Dkt. 1, the “Complaint”) in the above-captioned action;

WHEREAS, Plaintiff effected service of the Complaint on Defendants Fasolo, Luther, Blair, and the Committee on February 8, 2024 (*see* Dkts. 8–11), and on Defendant J&J on February 12, 2024 (*see* Dkt. 7);

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a) and this Court’s Judicial Preferences, the current deadline to answer or otherwise respond to the Complaint, or to file a letter requesting a pre-motion conference with regard to motions to dismiss the Complaint, is

February 29, 2024, for Defendants Fasolo, Luther, Blair, and the Committee, and March 4, 2024, for Defendant J&J;

WHEREAS, Defendants intend to file a motion to dismiss the Complaint and, before bringing their motion to dismiss, to submit a letter requesting a pre-motion conference pursuant to this Court's Judicial Preferences;

WHEREAS, the Parties have met and conferred, and have agreed upon the schedule proposed herein;

IT IS HEREBY STIPULATED AND AGREED by and between the Parties, through their undersigned counsel, and subject to the approval of the Court, as follows:

1. Defendants' deadline to submit a letter requesting a pre-motion conference with regard to their anticipated motion to dismiss the Complaint shall be extended to and until March 21, 2024;
2. Plaintiff's deadline to submit a letter in response to Defendants' letter shall be extended to and until April 4, 2024; and
3. Defendants' deadline to move to dismiss the Complaint shall be extended to fourteen (14) days after the later of the date of (i) the pre-motion conference, or (ii) the Court's decision not to conduct such a conference.

IT IS SO STIPULATED:

Dated: February 29, 2024

Respectfully submitted,

/s/ Jamie Crooks

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SO ORDERED, this ____ day of _____, 2024

HON. ZAHID N. QURAISHI
UNITED STATES DISTRICT JUDGE